

December 4, 2017

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: Comments on NCUA 2018-2022 Draft Strategic Plan

Dear Mr. Poliquin:

On behalf of the 2.2 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the National Credit Union Administration (NCUA) 2018-2022 Draft Strategic Plan. The Strategic Plan directs agency operations and priorities through the 2018 to 2022 timeframe and is significant for credit unions because these priorities often directly affect credit unions.

HCUA supports NCUA's implementation of virtual examinations with remote monitoring and the enactment of more flexible examination schedules. The development of greater offsite monitoring capabilities by NCUA staff could allow staff to spot supervisory issues earlier and require less NCUA staff onsite for exams. This would increase staff efficiency by eliminating dead time related to staff travel and save on travel expenses.

As outlined in the Regulatory Reform Agenda, the future treatment of Bank Secrecy Act (BSA) compliance reporting requirements should be increased to reflect economic realities. At minimum, these thresholds should be increased to \$20,000. The current thresholds are so low that law enforcement agencies are overrun with reports slowing the efforts to locate criminal financiers.

Furthermore, HCUA maintains interest in the agency funding an independent third-party review of field examiners. The review would provide an unbiased method to collect data on field examination consistency across the regions and would help inform the agency to direct efficient use of the agency training and resources.

As always, we appreciate the opportunity to review this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Brad Douglas
President/CEO